

Kay E. Brooks, Complainant, produced on the part of herself, having first been duly sworn, deposes and says:

BY MR. STILLRICH:

Q Will you please state your full name, age and residence?

A Kay Earline Brooks, 304 Broadway, Frederick, age 31.

Q And you are the Complainant, Kay E. Brooks, Personal Representative of the Estate of Martha Beolia Jackson?

A Yes.

BY MR. FINEGAN:

Q Martha Beolia Jackson was your grandmother?

A Yes.

Q When did she die?

A May 31, 1979.

Q What was the date of your appointment as the Personal Representative of her Estate?

A June 11, 1979.

Q You have heard the statement of counsel concerning the events regarding the sale of the property in New Market and the chain of title is that statement true and correct?

A Yes, its true and correct.

Q Was Charles A. Jackson your grandmother's husband?

A Yes.

5

Q What was his date of death?

A November 7, 1970.

Q You are aware that your grandmother purported to own certain property in New Market?

A Yes.

Q I show you a plat of New Market, can you describe the location of your grandparent's property with relationship to Federal Street?

A It was on the West side of Federal Street, the house and the lot connected.

Q Was the lot on the east or west side of the house?

A West side of the house.

Q According to the plat, which lots did your grandmother actually possess?

A Lots 19 and 20.

Q To your knowledge did your grandparents actually have possession of the property?

A Yes.

Q Did they reside there?

A No, it was always rented out.

Q To your knowledge did anyone else other than your grandparent's tenants